

REMARKS

Status of Claims

By this Amendment, claims 1, 2, 5, 20, and 22 have been amended and claims 6-19 have been canceled. Thus claims 1-5 and 20-22 are pending. Reconsideration of the rejections of all claims is earnestly solicited in view of the above amendments and the following remarks. The Amendments to the claims are fully supported by the specification and do not introduce new matter. Entry of this Amendment and timely allowance are requested.

Rejection of Claims 1, 3, 4, 7, 8, 10, and 11 under 35 U.S.C. § 102(e)

Claims 1, 3, 4, 7, 8, 10, and 11 were rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 5,946,499 to Saunders. This rejection is respectfully traversed.

Saunders fails to disclose several features of claim 1, including a dynamic text interface in which the abstraction of the document is such that a position within the document is represented as a floating anchor to a node. Saunders additionally fails to disclose a text processor input method for attaching a property to the document in at least one position in the document, wherein the property preserves originally entered data in order to facilitate text correction.

Saunders discloses the use of a Text Service Manager (TSM) operating between an application and a text service. Saunders provides a method for determining which text service is best equipped for correcting text. Saunders discloses this search process in FIGs. 4A and 4B and the corresponding description. The TSM of Saunders analyzes text and cycles through each available text service in order to determine if the analyzed text should be corrected by a particular text service. As set forth in Column 5, lines 57-60, the order of cycling through the text services is arbitrary. The text in the documents described by Saunders all presumably appears identical, such that it is not evident from the appearance of the text whether the text came from voice recognition software, a tablet, or a keyboard, etc. Thus a determination process such as that described above is necessary to identify the source of the text.

Accordingly, Saunders is forced to cycle through each handler every time an event occurs. Saunders is unable to preserve access to original data by attaching a property as required by claim 1.

Furthermore, Saunders fails to disclose a dynamic text interface that references a position in a document as a floating anchor to a node. Contrary to the assertion in the Office Action that Saunders discloses a tree structure including nodes for organizing an application document in FIG. 3, Saunders fails to disclose such a structure. Instead, FIG. 3 represents a TSM document, which is part of the text services manager, and is not an application document for which a position is referenced. Furthermore, the nodes of FIG. 3 do not represent "positions" in a document. Instead, the nodes of FIG. 3 represent objects that are not specific to any location. See Column 4, lines 19-44 of Saunders.

Because Saunders fails to disclose at least the features set forth above, Saunders fails to anticipate the invention of claim 1. As will be further explained below, the additional references applied in the Final Rejection, as they may be applied to amended claim 1, fail to obviate the deficiencies of Saunders.

Claims 3 and 4 depend from claim 1 and define over the art for at least the reasons set forth above. Claims 7, 8, 10, and 11 have been canceled, thereby rendering the rejection moot with respect to these claims. Accordingly, withdrawal of the rejection under 35 U.S.C. §102 is respectfully requested.

Rejection of claims 2, 9, and 14-17 under 35 U.S.C. §103(a)

Claims 2, 9, and 14-17 have been rejected under 35 U.S.C. §103(a) over Saunders in view of U.S. Patent No. 5,511,193 to Tung *et al.* (hereinafter "Tung"). This rejection is respectfully traversed.

Even if combined, Saunders and Tung lack several features of claim 2 as well as independent claim 1. As acknowledged in the Office Action, Saunders fails to disclose the dynamic text interface of claim 1. Similarly, Tung also fails to disclose a dynamic text interface in which the abstraction of the document is such that a position within the document is represented as a floating anchor to a node.

Although Tung discloses representing a document as either inline input or a floating input window (See Column 5, lines 23-28 of Tung), Tung fails to disclose a

floating anchor to a node as claimed. Neither Tung nor Saunders discloses that a document may be represented as an abstraction in a tree structure that includes nodes and that the position of a node may be represented by a floating anchor. Furthermore, Tung fails to obviate the additional above-noted deficiencies of Saunders.

In summary, both Tung and Saunders fail to disclose several features of the invention of claims 1 and 2. Specifically, both Tung and Saunders fail to disclose attaching a property to the range of text in order to preserve original data. Additionally, Saunders and Tung fail to disclose a dynamic text interface in which the abstraction of the document is such that a position within the document is represented as a floating anchor to a node.

As set forth above, the references, even if combined, fail to disclose each and every feature of the invention of claims 1 and 2. In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686,688 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

In order to make a prima facie case of obviousness, a teaching or suggestion of the combination must be found in the prior art. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). No teaching or suggestion is present in the art for modifying Saunders with the disclosure of Tung

Accordingly, because the references, even if combined lack several features of claims 1 and 2 and furthermore because no teaching or suggestion is present for modifying Saunders to arrive at the invention of claims 1 and 2, the references fail to render the claims obvious. Claims 9 and 14-17 have been canceled rendering the rejection moot with respect to these claims. Accordingly, withdrawal of the rejection is respectfully requested.

Rejection of claims 5, 6, 12, 13, 20, and 21 under 35 U.S.C. §103(a)

Claims 5, 6, 12, 13, 20, and 21 have been rejected under 35 U.S.C. § 103(a) over Saunders in view of U.S. Patent No. 5,524,193 to Covington et al. (hereinafter "Covington"). Claims 5, 6, 12, and 13 have been cancelled thereby rendering the rejection moot with respect to these claims. This rejection is respectfully traversed as it may be applied to claims 20 and 21.

Both Saunders and Covington fail to disclose at least a third method by which the handler is able to attach a property to the document at the range specified by the range object, the property providing access to original data used for insertion of text within the range as required by claim 20. As acknowledged in the Office Action, Saunders fails to disclose this feature. Covington also fails to show attaching a property to text in order to provide access to original data. Covington merely discloses the association of particular words or phrases with multimedia events.

Thus, even if combined, Covington and Saunders fail to render obvious the invention of claim 20. Claim 21 depends from claim 20 and defines over the art of record for at least the reasons set forth above with respect to claim 20. Accordingly, withdrawal of the rejection is respectfully requested.

Remaining §103(a) rejections

Claims 18, 19, and 22 were rejected over Saunders in view of both Tung and Covington. Claims 18 and 19 have been canceled, rendering the rejection moot. Accordingly, withdrawal of the rejection is respectfully requested.

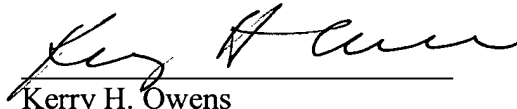
Claim 22 depends from claim 20. This rejection is respectfully traversed. Tung fails to obviate the above-noted deficiencies of Saunders and Covington with respect to claim 20. Accordingly, withdrawal of the rejection of claim 22 is respectfully requested.

CONCLUSION

Claims 1-5 and 20-22 are pending in this application. In view of the amendments and remarks, applicants respectfully request that this application be allowed and passed to issue. Should any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112 referencing Attorney Docket No. MFCP.87507.

Respectfully submitted,

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